U4 PRACTICE INSIGHT

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Lessons learned
from the evaluation of five Council of Europe projects

How successful are donor supported anti-corruption reforms? In this Practice Insight, the author takes a look at the evaluation of five large-scale technical assistance projects and gives an insight as to why we might not be as successful as we wish: Anti-corruption projects are often fraught with activities to be delivered in a relatively short time frame. In addition, it shows that fulfilling indicators is not always an acknowledgement of achieved impact, and that donors need to better understand how to build capacity in the area of anti-corruption.

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How successful are donor supported anti-corruption reforms? In this Practice Insight, the author takes a look at the evaluation of five large-scale technical assistance projects and gives an insight as to why we might not be as successful as we wish: Anti-corruption projects are often fraught with activities to be delivered in a relatively short time frame. In addition, it shows that fulfilling indicators is not always an acknowledgement of achieved impact, and that donors need to better understand how to build capacity in the area of anti-corruption.

Background: the Council of Europe's Anti-Corruption Engagement

The Council of Europe (CoE) has been involved in technical assistance projects in the area of anti-corruption and money laundering for over a decade. Projects have been implemented by the Corruption and Fraud Unit in the Directorate of Co-operation within the Directorate General for Human Rights and Legal Affairs, and organisational structures preceding it.[1] The implementing mechanisms are similar for all projects: an international advisor, who is also an expert in at least one of the subject areas covered, is in charge of leading the project in the partner country, assisted by a national expert and a limited number of national administrative support staff; the team is backed up by the Council of Europe secretariat in Strasbourg, which is also in charge of managing the project budget. Short-term national and international experts are hired on an activity basis.

The Council of Europe understands its technical assistance projects as one of the three strands of its work on anti-corruption and money laundering. The other two strands are:

i. Standard-setting – the Council of Europe has created a comprehensive corpus of criminal and civil law instruments against corruption: conventions, as well as soft law recommendations on issues such as political party financing;[2] and

ii. Monitoring – through the Group of States against Corruption (GRECO)[3] member states to the above mentioned instruments participate in a process of peer review to assess their compliance with them.

For candidate and aspirant candidate countries to the European Union (such as the countries of the Western Balkans and Turkey), GRECO and the technical assistance projects have a specific importance, as the European Commission's annual Progress Reports – which assess countries' progress in meeting the various EU accession criteria – are, *inter alia*, informed by the results of the projects, and GRECO evaluation reports. The Council of Europe also has substantial political weight in other member states, such as those of the Caucasus region.

It is for the above reasons – the fact that it sets standards and hosts GRECO, and because of its political weight in member states and its importance for the EU accession process – that donors have, over the past decade, found in the Council of Europe, an implementing partner for their technical assistance projects. The five

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[1] See an overview of past and current information at http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/default_en.asp.

[2] These are the Criminal Law Convention on Corruption and its Additional Protocol; the Civil Law Convention on Corruption; Resolution (99) 5 of the Committee of Ministers of the Council of Europe on the Establishment of the Group of States against Corruption; Resolution (97) 24 Establishing the 20 Guiding Principles of the Fight against Corruption; Recommendation R (2000) 10 on Codes of Conduct for Public Officials and Model Code of Conduct for Public Officials; Recommendation R (2003) 4 on common rules against corruption in the funding of political parties and electoral campaigns.

[3] For an overview of GRECO, see their site at http://www.coe.int/t/dghl/monitoring/greco/default_EN.asp. A comparative discussion of the GRECO monitoring mechanism can be found in the U4 Expert Answer 'Comparative assessment of anti-corruption conventions' review mechanisms' http://www.u4.no/helpdesk/helpdesk/query.cfm?id=163.

projects that form the basis of this Practice Insight have been funded by Sida (Moldova, Western Balkans), USAID (Azerbaijan), the Kingdom of the Netherlands (Georgia), and the European Commission (Moldova, Turkey).

Since 2006, the Council of Europe has made a continued effort to capture the impact of its work through independent evaluations. At the time of writing, five evaluations[4] had been completed, while an additional one was in the process of being finalised. This Practice Insight highlights the most important issues emerging from these evaluations.

Description of the Interventions

The following projects were evaluated:

PACO Impact: 'Implementation of Anti-Corruption Plans in South-Eastern Europe': A multi-country project implemented from 2004 to 2006 in Albania, Bosnia and Herzegovina, Croatia, Macedonia, Serbia and Montenegro (including Kosovo), funded with €1.5 million by the Swedish International Development Agency (SIDA).[5] The project supported participating countries' elaboration of national anti-corruption strategies, and aimed at strengthening countries' institutions responsible for the fight against corruption. The project also assisted countries in improving their anti-corruption legislation.

TYEC: 'Ethics for the Prevention of Corruption in Turkey': A €1.5 million project mainly funded by the European Commission and implemented between 2007 and 2009. It focused on strengthening the public service ethics framework as part of the preventive aspect of the fight against corruption in Turkey. The project provided support for implementation of the Code of Ethics,

including curriculum development and training-of-trainers for a nationwide training program, and contributed to capacity building of the already existing Ethics Council. TYEC also aimed at supporting broader anti-corruption efforts, such as steps toward drafting a national anti-corruption strategy.

MOLICO: Project against Corruption, Money Laundering, and the Financing of Terrorism in Moldova: the project focused on support for implementation of the national anti-corruption strategy and on strengthening the government institution responsible for the fight against corruption. It also covered anti-money laundering measures. MOLICO was co-funded by the European Commission, the Council of Europe, and Sida, with an overall financial envelope of €3.5 million over the course of 36 months (2006-2009).[6]

AZPAC: Support to the Anti-Corruption Strategy of Azerbaijan: the 24-month (2007-2009) project's objectives were to strengthen the strategic framework against corruption in Azerbaijan in line with GRECO recommendations, to improve legislation, strengthen corruption prevention capacities, and assist in establishing a functioning regime against money laundering. The project was co-funded by USAID and the Council of Europe (total: US$0.8 million).[7]

GEPAC: Support to the Anti-Corruption Strategy of Georgia: implemented over a period of 32 months from 2007 to 2010, this project aimed at supporting the Georgian authorities in drafting and implementing a national anti-corruption strategy and strengthening the legal framework in the fight against corruption, as well as the capacities of, and the cooperation among law enforcement agencies on corruption-related

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[4] One of the four evaluations has been a mid-term evaluation. It has been included here because it has yielded insights into project design and the formulation of impact indicators.

[5] For a project summary, see
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PACO%20Impact/Summary%20of%20Project%20Implementation.PDF.

[6] For a project summary, see
http://www.coe.int/t/dghl/cooperation/economiccrime/MoneyLaundering/Projects/MOLICO/Molico_en.asp.

[7] For a project summary, see
http://www.coe.int/t/dghl/cooperation/economiccrime/MoneyLaundering/Projects/MOLICO/Molico_en.asp.

issues. The project had a budget of €700.000 and was funded by the government of the Netherlands.[8]

Analysis and Lessons learned

For improving future project design, the following lessons learned can be extracted from a comparative reading of the evaluations for the five projects.

Depth vs. Breadth

A careful balance between a holistic range of activities and the feasibility of their implementation within the project duration needs to be sought. Four of the five evaluated projects (*MOLICO, PACO Impact, AZPAC, GEPAC*) had a rather broad design—reflecting conventional wisdom of the need for a multi-pronged approach to corruption (including repression, prevention, and education). These projects provided assistance in drafting and adopting relevant legislation in line with international standards, strengthening preventive capacities, increasing investigative and prosecutorial capacities to deal with corruption offences, developing awareness-raising tools, and educative approaches towards corruption, among other activities.

For example, *PACO Impact* significantly contributed to countries' starting to work on effective and efficient mechanisms to regulate conflict of interest, as well as countries' giving greater emphasis to prevention and education about corruption to complement traditionally favoured repressive approaches.

However, due to a limited time horizon the breadth of issues made the projects vulnerable in terms of fulfilling all activities and objectives. The spectrum of topics was, in these four projects, ensured by a high density of activities to cover all necessary areas. *MOLICO*, over its 36 months duration, had a work plan comprising 143 activities.[9] *PACO Impact* implemented, in 24 months, a staggering number of around 70 activities. The evaluations highlight that such an ambitious agenda leaves little time for sufficient preparation or thorough follow-up across all covered areas.

For example, during the project design stage, *PACO Impact* agreed the project objectives with the respective partner countries. Most countries had requested assistance in drafting their respective anti-corruption strategies and action plans. In the case of Bosnia, on the other hand, such assistance was not solicited by the national counterpart institutions in charge of the drafting process. Council of Europe expertise was called on at the very end of the process, and therefore became more of a formality than a substantive contribution. Less pressure to deliver a great number of activities might have helped the implementer to prepare and work with the beneficiary to make more effective use of the assistance on offer.

In the case of *MOLICO* in Moldova, the project provided advice on legislative drafting for several laws including the Law on Conflict of Interest, and the Anti-Corruption Law. But in several instances, this advice was only taken into account to a minimal extent, if at all. As a result, parliament adopted legislation that falls short of international standards, with full knowledge of the Moldovan authorities.[10] Although this, of course, points to a lack of political will on the Moldovan side, a focus on fewer topics might have given the project team more time to work with the counterparts to consider changes instead of having

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[8] The evaluation report was not, yet, publicly available at the time of writing, but should be on the website of the Council of Europe by early summer 2010.

[9] See MOLICO logframe at
http://www.jp.coe.int/CEAD/JP/Default.asp?WorkPlanID=94 , and the PACO Impact Workplan at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PACO%20Impact/PACO_Impact_Workplan.pdf .

[10] See MOLICO evaluation report at
http://www.coe.int/t/dghl/cooperation/economiccrime/MoneyLaundering/Projects/MOLICO/912_MOLICO_EvalRep3a%20_3july09.pdf, p. 12.

to move on with implementing a tight schedule of activities.

The evaluation of *PACO Impact* concluded that there is increasingly a need to concentrate on a limited number of areas and favour depth over breadth to assure systemic changes in partner countries.[11] And the senior management of the Council of Europe secretariat has also conceded that they would wish to see longer time frames and more focused activity agendas in future technical assistance projects.[12]

Political Will, Leverage and Conditionality

The Council of Europe, just as other implementing organisations, faces challenges when it comes to political will on the side of counterparts to carry out complex reforms. It should reflect on ways in which it can make better use of its political weight and reputation to foster the development of political will.

For example, in the MOLICO project, a number of activities were foreseen on legislation governing the financing of political parties, conflict of interest, and the development of a regime of asset declarations to be filed by public officials. While expert advice on reforming the political party financing regime was to a significant extent incorporated in the draft legislation subsequently adopted by parliament, advice on conflict of interest and anti-corruption legislation was almost completely disregarded. Activities on asset declarations of public officials were dropped during the implementation stage, as there was a distinct lack of political will to move this topic ahead. The evaluators found that the

Council of Europe could have pushed more for the reforms. As the MOLICO evaluation concluded, "... it would have been important to have at least made an attempt at implementation. [...] The fact that other organisations were covering these topics seems secondary, as the Council of Europe, as a standard-setting organisation with potentially great political gravitas, should have, as a point of principle, pushed these activities, even though they might not have been popular with local counterparts."[13]

In the case of AZPAC, the Azerbaijan authorities were reluctant to publish the results of studies on corruption in the health, education and tax systems. This echoed experience from other international projects in Azerbaijan.

One of the arguments for donors to give money to the Council of Europe for technical assistance projects is that they feel that the organisation has unique levers on countries to effect reforms. Or, as a donor representative said during one evaluation mission, "[i]f the Council of Europe cannot achieve reform—who can?" The question, then, is how the Council of Europe can more effectively bring its political gravitas to bear on achieving the objectives of technical assistance projects. This is a difficult question not least because all countries in which technical assistance projects are being carried out are also Council of Europe member states. Possible avenues to explore include strengthening the relationship between the projects and GRECO as the overarching monitoring mechanism for compliance with anti-corruption standards, more proactive work on visibility of the projects in the countries, proactive sharing of key documents such as project evaluations with other donors, and strengthening political support for technical assistance projects in the Council of Europe. The link between project performance and the EU Progress Reports for countries with a prospect of EU membership provide a good framework to

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[11] See M. Trivunovic PACO Impact Project Assessment Report at http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PACO%20Impact/PC-TC(2006)-EvaluationRep.MT-July06.PDF, p. 5: 'Technical assistance continues to be needed, albeit on an increasingly sophisticated level. This opens new opportunities for [...] project area-level assistance on particular aspects of implementation.'

[12] Conversation with A. Seger, then CoE Head of Department in charge of technical co-operation on economic crime issues, in June 2009.

[13] See V. Devine and T. Hoppe, MOLICO Evaluation at http://www.coe.int/t/dghl/cooperation/economiccrime/MoneyLaundering/Projects/MOLICO/912_MOLICO_EvalRep3a%20_3july09.pdf, p. 29.

push for progress. The challenges posed by a lack of political will are greater with respect to countries that are not EU candidates, as the scope for leverage and conditionality seems smaller.

In the case of the MOLICO project in Moldova, a substantial amount of funds was earmarked for technical upgrading of the main counterpart institution, the Centre for Combating Corruption and Economic Crime (CCCEC), with computers and other equipment. A proper assessment of specific needs was never done, however, and much of this equipment ended up unused. In a relatively poor country such as Moldova, where furnishing an entire institution with state-of-the-art IT equipment normally constitutes a substantial expenditure in the overall budget, donors should explore whether the procurement of such equipment could be tied more closely to performance in other areas of the project.

However, this is not a solution in the context of a country such as Azerbaijan, which is significantly wealthier and which is likely to have interests different to those of Moldova to participate in projects of this kind. In such settings, other incentives need to be explored. In the case of Azerbaijan, the political leadership of the country has been very conscious about its international image, and donors could use this concern to include sensitive reform issues – such as anti-corruption – in the partner dialogue at highest level.

The Importance of the Project Identification and Design Stage

The evaluations have confirmed the crucial importance of the process of project identification and design—and the fact that some of the key concepts, such as what constitutes genuine capacity building, need to be better understood. The following lessons have emerged that might guide future project design:

Project Time Horizons

The Council of Europe, and donors, should consider a longer time-span for future projects.

First, this observation echoes concerns over absorptive capacities of partner countries: the extensive scale of programmes like MOLICO (143 activities over 36 months) and PACO Impact (70 activities over 24 months) pose a challenge to any recipient government. The responsibility for technical assistance projects comes often in addition to government staff's day-to-day activities. Given that there is in most cases more than one technical assistance project implemented any given country, staff of target institutions often spend a significant amount of time in project-related activities, leaving little time to do their actual work and to apply what has been learned during the trainings.

These dilemmas apply to non-governmental actors, too. With the arrival of a similar project funded by the US, MOLICO, for example, faced the problem of a lack of counterparts on one of its civil society components—at some stage, it was literally impossible to have journalists attend the foreseen activities, as almost all of them seemed to be engaged elsewhere.

Second, a project with a lifespan of 2 years will be caught between different tensions: the need to quickly deliver activities (some of which only will have long-term impact) versus rather slow political cycles in the country of implementation. Thus in order to implement lasting change, processes would have to be followed for longer than an 18-month project cycle.[14] Short projects also run counter to the acknowledgement that it takes time to change attitudes and institutional cultures.

Third, the evaluations also provide useful evidence about the time necessary to conduct certain types of activities. The TYEC project

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[14] This is particularly problematic when it is remembered that the inception phase and delays in implementation often further limit the actual period of project implementation.

demonstrates the prolonged process of conceiving, designing, and piloting training modules before they can be rolled out as institutional-level training strategies. In Moldova, the MOLICO timeframe for building the institutional capacity for corruption risk assessments had to be dramatically adjusted upwards. What was initially designed as a series of 15 seminars introducing the methodology to different institutions ultimately became 35 seminars delivered to 30 specifically created working groups plus one high-level working group, a substantial number of expert opinions, and a study tour. The process was not yet finished at the time of the evaluation in June 2009.

Time vs. Money

Increased project length does not necessarily imply that significantly more money would have to be invested. Rather, it is the time frames that are mostly unrealistic, as the schedule of activities to be implemented with the earmarked budget was in some cases daunting. For example, the PACO Impact project, albeit funded with seemingly substantial €1.5 million, had to implement in excess of 70 activities, including six regional events and activities in 7 project areas over a period of just 2 years. At the same time, the PACO Impact evaluation, as well as the evaluation of TYEC, found that too few resources had been budgeted for the administrative and management side of the projects.[15] As mentioned above, the Council of Europe secretariat has started to discuss this issue already, and it would seem that a sustained level of presence and pressure might be more useful to effect change than a short project with a high level of activities without follow-up. This would require some rethinking on part of the donors, too, as it would

mean moving away from equating a huge amount of activities with a greater prospect of a project's success. Anti-corruption reforms are difficult, and they need a medium- to long-term approach in order to take effect. Projects need to reflect this.

Understanding Capacity Building

The evaluations have provided some evidence that we need to better understand how to build capacity in the area of anti-corruption. Recommendations by the GRECO monitoring mechanism regarding capacity building need to take into account the experiences of technical assistance projects.

One of the clear lessons that emerge from the evaluations is that projects need to address capacity building in a more realistic manner. For example, the AZPAC evaluation concludes that "... it cannot be expected that three pilot trainings conducted with human resources departments of the various state agencies could automatically multiply into training of all 30,000 civil servants."[16]

This is complemented by the TYEC evaluation, which showed that a conservative estimation of the size of the potential target group *ex-ante* should have made clear that training needed to be approached strategically. The evaluation established that the overall size of the target audience for ethics trainings was in excess of 3 million civil servants. The initial project design aimed for a target of 1,000 trainers to be trained at the end of the project, hoping that these, in turn, would be able to subsequently take care of all the country-wide training needs. In retrospect, it is clear that this was an overly simplistic assumption. The adequate number would in fact have been about 6,000 trainers.

Of course, getting the basic statistics right before designing an intervention will not *per se* guarantee success. But not taking the statistics

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[15] See M. Trivunovic PACO Impact Project Assessment Report at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PACO%20Impact/PC-TC(2006)-EvaluationRep.MT-July06.PDF, p. 4; V. Devine, T. Hoppe TYEC Interim Evaluation at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/TYEC/1062_TYEC_REP_InterEvalu_Dec08-1.pdf, p. 9.

[16] See T. Hoppe AZPAC Evaluation at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/AZPAC/951%20AZPAC%20Evaluation%20Report%20final-1.pdf, p. 5.

into account at all will definitely lead to interventions falling short of their potential. Even having trained the initial 1,000 trainers, TYEC probably would have had some positive impact, at least at the level of the individual person trained. However, it is unclear whether any systemic changes can be expected from this. Likewise, in Moldova, which is comparatively small in size, MOLICO trained all prosecutors on certain topics, but it is too early to say whether, and if so, what impact this has had in terms of their capacity to prosecute corruption.

The evaluation for PACO Impact, too, confirmed the need to move away from isolated training events. According to the report, "[e]ducational initiatives continue to be welcome, although there is increasing sophistication of project beneficiaries about the usefulness of particular forms of implementation. It is highly recommended that future projects seek to integrate one-off seminars into existing educational institutions and/or longer-term programmes."[17]

Future efforts need to dedicate more time and resources during the project identification stage to better understand the actual size and needs of the different target groups, and the most adequate ways to address them. How, for example, can a training for judges on economic crime, corruption and money laundering, as foreseen in the PACO Impact project design, go beyond an awareness raising stage if conducted only over one day? Such a short training event cannot, in detail, cover all the different aspects of such complex issues for such a diverse target group.[18]

The evaluation of GEPAC in Georgia discussed this problem in connection with the project's output on capacity building of the prosecution.

The project's objective was that "[the] staff of specialised services within the Prosecution and other institutions fighting corruption will be able to deal with complicated high-profile corruption cases with international ramifications using multidisciplinary and pro-active approach." To achieve this, the project foresaw two training events and two study visits. To fully cover what is understood by 'international ramifications', it would, according to UNODC, be necessary for training to cover the following topics: role of the prosecutor and the investigator; corruption defined/substantive law issues; preconditions for successful investigations; detecting corruption; gathering and use of evidence cases; informants, witnesses and their protection; whistleblower protection; financial investigations, electronic surveillance, undercover operations, integrity testing, international judicial cooperation, extradition, mutual legal assistance, international repatriation of illicit assets.[19] Each of these subtopics would in fact merit a number of separate training activities. The expectation that such sequenced activities would be rolled out to all relevant staff illustrates that the task at hand is more complex than just organising a couple of training events and two study visits.

A random look into any GRECO evaluation report reveals the lack of specificity of their recommendations when it comes to capacity building. For example, the 2008 Evaluation Report of the Second Round of Evaluations on Georgia recommends "[...] to develop guidelines and effective training to improve the ability of tax inspectors to detect corruption offences, in particular as regards bribes concealed as legitimate expenses."[20] Of course, it would exceed

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17 See M. Trivunovic, PACO Impact Project Assessment Report at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PACO%20Impact/PC-TC(2006)-EvaluationRep.MT-July06.PDF, p. 5.

18 See AZPAC Workplan of Activities at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/951-AZPAC-Workplan-11Dec07.pdf, p. 7.

19 Argument provided in the evaluation of GEPAC at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/GEPAC/779_GEPAC_EvalRep_April10.pdf, quoting the United Nations Handbook on Practical Anti-Corruption Measures for Prosecutors and Investigators, at http://km.undp.sk/uploads/public/File/AC_Practitioners_Network/Handbook_for_prosecutors.pdf.

20 Recommendation xiii of the Second Round Evaluation Report on Georgia, p. 31, at
http://www.coe.int/t/dghl/monitoring/greco/evaluations/round2/GrecoEval2(2006)2_Georgia_EN.pdf.

the mandate of GRECO to make specific recommendations as to what constitutes 'effective' training. Yet technical assistance projects often follow the themes of GRECO recommendations and are understood by the countries as helping them to move toward fulfilling the recommendations. The Council of Europe therefore needs to better define what constitutes building the capacities of countries' institutions, and how to tailor technical assistance projects around this. This might also be relevant for other emerging review mechanisms such as the one for the UN Convention against Corruption in which the provision of technical assistance plays a central role.

Impact Indicators

A comparative reading of the five evaluations confirms that fulfilled indicators are not an acknowledgement of achieved impact: a project can be successful in its own logic by achieving many or even most of its indicators. However, at the same time, there is little information to grasp the actual impact of the project on reducing corruption. More work needs to be done to clarify the correlation between design of project indicators and the desired impact, as well as to assess the latter.

Of the evaluated projects, MOLICO, GEPAC, and AZPAC had planned to conduct repeat surveys on the perception of corruption in Moldova, Georgia, and Azerbaijan, respectively. The projects also tried to utilise the results of other surveys to capture success. For example, one of the meta-indicators of success in the AZPAC project assumed that an increased level of compliance with international standards (such as the Council of Europe's Criminal and Civil Law Conventions against Corruption, the GRECO recommendations, and national anti-corruption instruments) would result in a positive trend in corruption perception surveys. This included such surveys planned in the framework of the project itself, as well as surveys by other international organisations such as Transparency International

and Freedom House.[21] In the cases of both AZPAC and MOLICO it proved difficult to actually carry out the surveys as foreseen in the work plan, as the project duration was too short to do so. But, as the AZPAC evaluation argued,[22] using perception surveys as proof of trends, in particular of short-term trends, is fraught with considerable problems that make them unsuitable as tools to capture impact. These problems include the methodology of the various surveys, their availability, and the delay with which surveys capture change, if they do so at all.

Regarding the use of the level of compliance with international standards as an indicator,[23] including those set by the Council of Europe, discussions about what constitutes compliance need to be taken into account for future project design. A separate paper published by U4 discusses the issue on the case of the AZPAC project.[24] It argues that there is still too much emphasis on the formal convergence of a country's legislation with, for example, GRECO standards, while too little attention is paid to actual implementation of such legislation. In the case of AZPAC, this would suggest that while at the legislative level, the project has made notable progress towards

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[21] See AZPAC Workplan at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/951-AZPAC-Workplan-11Dec07.pdf, p. 3.

[22] See T. Hoppe, AZPAC Evaluation at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/951-AZPAC-Workplan-11Dec07.pdf, p. 9.

[23] For example, indicators of success in the case of AZPAC were to be:

Level of compliance with the Council of Europe Criminal Law Convention on Corruption;

Level of compliance with the GRECO and OECD/ACN recommendations;

Level of implementation of Council of Europe and other international standards in the fight against corruption;

Level of implementation of the measures of the new Anti-corruption Strategy and Action Plan. See AZPAC Workplan, p. 3, at
http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/951-AZPAC-Workplan-11Dec07.pdf.

[24] See Q. Reed (2010), Regulating Conflicts of Interest in Challenging Environments: The Case of Azerbaijan (U4 Issue 2010:2) at http://www.cmi.no/publications/file/3622-regulating-conflicts-of-interest-in-challenging.pdf.

compliance, not much has changed at the level of enforcement. Nonetheless, projects have been judged as successful if they contributed to passing legislation in line with international standards, while *de facto*, little changed on the ground. This is not a per se argument against using compliance as an indicator, but rather for a closer alignment of the Council of Europe's technical assistance projects with the organisation's monitoring mechanisms, such as GRECO, in order to better support *de facto* compliance through technical assistance projects and at the same time improve assessment of *de facto* change through monitoring mechanisms. This would increase the credibility of the monitoring mechanisms, but also their clout, and therefore, the likelihood of success for the projects. Legal compliance can at best be a first level indicator and should never be confused with measuring the effectiveness of anti-corruption measures.

In other cases, indicators have been used to establish a correlation between project activities and levels, respectively numbers of prosecutions or investigated cases. However, it cannot be expected that the number of prosecutions or convictions on corruption-related crimes would rise as a direct result of training activities in the framework of a project with a 2-year life span. Thus, as the evaluations have shown, a number of indicators only make sense with a longer time frame attached to them. It is important that such indicators are used with much more caution in the future. This is essentially about managing the public's and the donors' expectations: if a project promises to deliver higher conviction rates in corruption cases, it will have to justify why this did not happen; this might be accompanied by a loss of credibility.

In terms of assessing capacity building via indicators, there is need to better understand and more concretely define what is meant by 'enhanced' or 'increased' capacity or 'level of awareness'. Equally, as described earlier on the example of GEPAC, there is need for a better understanding about what makes training

meaningful (i.e. how many representatives of which institutions have to be trained on what precise issues over what period of time to achieve any change across a range of vectors). This concerns not only the departments of the Council of Europe dealing with the design of technical assistance projects, but also, for example, GRECO. The evaluation of the TYEC project has probably shown most drastically that there is a need, in the project design phase, to identify the actual size of the project target group, as described above. There is no reason why such calculations should and could not be made at the beginning of the project design stage. For a country the size of Turkey, such calculations are absolutely imperative, as funds that would be considered substantial in smaller countries have to be used differently there. There is simply no possibility to reach out to the totality of any target group in Turkey through one single project, in contrast to countries such as Moldova.

Conclusions

Based on the experience and evaluation of five Council of Europe projects the following conclusions can be made for future donor support for anti-corruption efforts:

• More time and resources should be spent on project formulation and identification. This should include ascertaining basic parameters on which the type and sequencing of interventions will be based, such as the size of the specific target groups.

• Anti-corruption reforms take time, and for many interventions to be successful, momentum needs to be sustained over the medium term. Therefore, projects need to last beyond the conventional 2 to 3 years.

• Projects with a wide breadth of themes and activities might be suitable for initiating reforms. However, they need to be followed by projects that offer sophisticated, in-depth

assistance on specific topics, aimed toward effective implementation of reforms.

- Work needs to continue among donors on meaningful indicators of success and real impact of anti-corruption projects.

- Further reflection and action is needed on how to leverage political will for anti-corruption reform.

- In the case of the Council of Europe, the evaluations done by GRECO need to acknowledge lessons learned from technical assistance projects.

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